

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. Appln. No. 09/801,693

**REMARKS**

Claims 1-8 are all the claims pending in the application.

Claims 1, 2 and 6 stand rejected under 35 U.S.C. §102(b) as being anticipated by USP 6,028,924 to Ram et al. Claims 3-5 and 7-8 are objected to as being dependent upon a rejected base claim. Applicants respectfully traverse these rejections, and request reconsideration and allowance of the pending claims in view of the following arguments.

Claim 1 of the present application recites a method for providing a service in a telecommunication network comprising at least a service switching unit (SSP) able to access a service control plane comprising at least a service specific unit (HL-SCP) supporting services and at least a service infrastructure manager (LL-SCP), the method comprising the steps of identifying at the infrastructure manager (LL-SCP), by means of a service identification, the service specific unit (HL-SCP) supporting a service, and establishing a direct dialog between the service switching unit (SSP) and the specific unit (HL-SCP). The Examiner has asserted that Ram anticipates claim 1 of the present invention. Applicants respectfully disagree. Applicants assert that Ram fails to teach at least the method step of identifying at the infrastructure manager (LL-SCP) the service specific unit (HL-SCP).

Specifically, Ram provides a method and apparatus for deploying advanced services into a public switched telephone network. As shown in Fig. 1 of Ram, the Ram distributed programmable service architecture 10 includes a programmable switch matrix 24 embodied within a public switched telephone network (PSTN) 20. A number of user terminals 22 are connected to the PSTN 20. The programmable switch matrix 24 includes a programmable

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service node (PSN) 28 that provides external programmability to the programmable switch matrix 24. The programmable switch matrix 24 is communicatively coupled via a communications link 40 to a service control unit (SCU) 34 within a service platform 32. The programmable switch matrix 24 is communicatively coupled via a communications link 42 to a media resource unit (MRU) 36, respectively, within a media resource platform 33 (Ram, col. 4, lines 39-62).

The MRU 36 interacts with calls connected via the communications link 42 to the programmable switch matrix 24 under the control of the SCU 34 (Ram, col. 5, lines 31-33). The SCU 34 sends a message to MRU 36 in response to a MRU event notification from MRU 36 (Ram, col. 12, lines 43-56).

A service call associated with a specific port and generated by a user terminal 22 is received by the programmable switch matrix 24. If the service call is a conventional call, the programmable switch matrix 24 processes the call in accordance with conventional call processing techniques. If the service call is identified as a call that requires specialized call control processing, the call enters what is identified as a "server mode" (Ram, col. 8, lines 23-32).

During the server mode, the call processing and hardware resources of the programmable switch matrix 24 are controlled by the SCU 34, and the PSN 28 communicates with the SCU 34 over the communications link 40 utilizing a service programming interface signaling protocol (Ram, col. 5, lines 2-6 and col. 5, lines 16-18).

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As shown in Fig. 13 of Ram, if in response to a trigger detection caused by a service all received on a port of the switch matrix 24, the PSN 28 determines that the call requires control by the SCU 34, it sends a New Call event notification message to the SCU 34 over the communications link 40. The SCU 34 then sends a New Call Accepted primitive or the New Call Rejected primitive back to the PSN 28 via the communications link 40. A New Call primitive instructs the PSN 28 that the New Call event notification was accepted and the port specified in the New Call event notification will be controlled by the SCU 24 (Ram, col. 23, line 39 to col. 24, line 5; and col. 19, lines 42-58).

The Examiner has directed Applicants to Abstract; col. 2, line 5 to col. 3, line 14; col. 5, line 63 to col. 7 line 23; and figures of Ram. However, the Examiner has not provided the device in Ram that teaches the infrastructure manager (LL-SCP) recited in claim 1, and the device in Ram that teaches service specific unit (HL-SCP) recited in claim 1. Applicants hereby ask the Examiner to provide more details.

In addition, Ram fails to teach identifying at the infrastructure manager (LL-SCP) a service specific unit (HL-SCP). Although the MRU 36 interacts with calls under the control of SCU 34, it is not identified by the SCU 34. Instead, it sends an MRU event notification to the SCU 34 to request for control signals.

Accordingly, Applicants assert that claim 1 and its dependent claims 2-5 are patentable.

Independent claim 6 of the present application recites an infrastructure manager (LL-SCP) receiving a service request message from a service switching unit (SSP), the infrastructure manager comprising means for detecting if an entire service number is contained in the service

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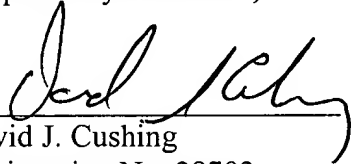
request message, means for requesting a missing part of the service number, and means for sending a trigger message to the switching service unit. Again, the Examiner has not provided the devices in Ram that teach these means. Applicants request the Examiner to provide more details.

For now, Applicants assert that none of these means is described in Ram, and claim 6 and its dependent claims 7-8 are patentable.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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